

Scott R. Grace
June 16 1994
94 RF 06627
Page 2

IHSS currently represents a protective risk level. The Department of Energy/Rocky Flats Field Office (DOE/RFFO) should make a concerted effort to ensure that the guidance CDH provides in terms of where the 1×10^{-6} risk levels are applied is realistic for the expected future use of Rocky Flats Plant.

On January 28 1994 during a meeting with EG&G DOE EPA and CDH Dames & Moore distributed an outline for TM 11 and discussed the approach toward developing remedial action alternatives for OU 1. At that time Dames & Moore presented an initial list of alternatives for OU 1 and explained how three general areas were targeted for remediation: the area south of Building 881 IHSS 119.1 and the area just east and south of IHSS 119.2. These general areas were being addressed jointly in some alternatives while other alternatives only targeted remediation of IHSS 119.1. This approach was suggested as a method of comparing the options of sitewide remediation to the 10^{-6} risk level against remediation of only the most contaminated area in OU 1 (to Federal maximum contaminant levels (MCLs)). At no time did either agency suggest approaching development of remedial action alternatives on an IHSS by IHSS basis.

On May 13 1994 EG&G once again met with the agencies to discuss their preliminary comments on the alternatives presented in TM 11. During that meeting the agencies stated that they were generally pleased with the content of the report. However some changes were suggested. During the meeting it was decided that a new modified limited action alternative would be included along with a phased approach to the thermally enhanced vacuum extraction alternatives. Once again at no time during this meeting did either agency suggest approaching development of remedial action alternatives on an IHSS by IHSS basis. Formal comments were going to follow within the next week but CDH's formal comments did not appear until June 6 1994.

Similarly during these meetings where the approach used in developing remedial action alternatives was presented to the agencies CDH did not raise the issues of the surface and subsurface soil media undergoing analysis for separate alternative development. From the onset the State has been informed that only the medium of groundwater would be targeted for alternative development. Again the recent CDH comments received on TM 11 do not coincide with the approach presented to the agencies since the beginning of the year. In addition TM 10 clearly identified the media being targeted in the OU 1 CMS/FS and in two sets of EPA comments and one set of CDH comments these issues were never raised.

In terms of impacts to the OU 1 CMS/FS it is unlikely that a quality draft report could be produced by August of this year if separate alternatives would have to be developed for each IHSS and each medium as suggested by CDH. Also if certain IHSSs are to be screened out from further consideration early in the CMS/FS then CDH must provide guidance as to how the 1×10^{-6} risk level should be applied. This IHSS by IHSS determination of whether remedial action evaluation is required should be handled separately from the CMS/FS because of the amount of scrutiny it will undergo. Applicable or Relevant and Appropriate Requirements (ARARs) issues (which are currently undecided) and PRGs will both play a role in determining if an IHSS is currently contaminated to levels that are not deemed protective.

I would also recommend that if the changes requested by CDH are to be incorporated in the OU 1 CMS/FS then a revised TM 11 should first be produced to ensure that we have satisfied the requirements of the State prior to conducting the detailed analysis of alternatives. This would

Scott R Grace
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94 RF 06627
Page 3

obviously result in substantial delays to our current schedule. Producing a TM 11 under the methodology proposed by CDH would require at least six weeks not including joint EG&G and DOE review and this is assuming that CDH provides clear guidance on how the determination of a protective level should be made for evaluating whether certain IHSSs should be included in the development of remedial action alternatives.

Currently the CMS/FS report is being prepared under the following guidelines:

Only the medium of groundwater is being formally targeted for remedial action alternative development although subsurface soils are being treated in IHSS 119.1 through the proposed alternatives using vapor extraction, steam treatment, and excavation. Surface soil hot spots are assumed to be removed as part of each alternative. Due to their limited size, they do not warrant separate consideration as a medium for alternative development.

IHSS 119.1 is being targeted for remediation under certain alternatives since it is the only area showing contaminant concentrations consistently above Federal Maximum Contaminant Levels (MCLs). Other IHSSs are targeted for remediation under the sitewide OU alternatives. These alternatives will attempt to remediate the site to the 10^{-6} risk level overall (under a residential scenario) which means that all IHSSs at OU 1 would be evaluated to the protectiveness level suggested by CDH regardless of whether or not they are evaluated independently or as a group.

I have instructed Dames & Moore to proceed with the CMS/FS under these guidelines and will not seek to address the written comments recently received from the State. As it stands now, however, I believe that it is imperative that we meet with the agencies to determine what approach would be acceptable for the CMS/FS report. If any of the changes mentioned throughout this letter are to be incorporated in the report, then I would suggest using the argument that CDH has deviated from the course set in all of our previous meetings to convince them to allow more time for preparation of the CMS/FS report. Please call me if you have questions regarding the material presented in this letter.



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Ong and 1 cc - S. R. Grace